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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 8, 1986

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Mr. Robert B. Courson
Chief, Superfund Branch
Environmental Protection Agency, Region X
1200 Sixth Avenue
Seattle, WA 98101-3188

Superfund Branch

Re: Review Comments on Final Report for Resource Recovery Corporation at
Pasco, Washington

Dear Mr. Courson:

This letter is to document the Washington State Department of Ecology's (Ecology) review of the Final Report for Resource Recovery Corporation, Pasco, Washington, prepared by Ecology and Environment, Inc. The review comments are a combination of comments from Mike Gallagher, Hazardous Waste Cleanup Program, and personnel from Ecology's Eastern Regional Office.

Ecology has specific and general comments. The specific comments will be referenced by section.

Specific comments follow:

1. 4.6-Demography: The report states that "approximately 1900 people reside within one mile of the site". On Page 13, the report states "approximately 35 people live within a one-mile radius of the site". Please clarify as to which is the correct number.
2. 5.2.2.1-Soil boring and soil sample collection: Composite samples may be a good first screening to indicate if there is possible soil contamination. However, it is limited as far as evaluating the amount and type of chemical contaminants in discreet soil zones beneath the burial areas. The method of soil sampling that was utilized during the investigation disturbed the samples and may have "diluted" the amount of contamination, especially when samples are composited from a depth of 30 to 70 feet.
3. 6.3.4.: Additional PCB (Aroclor 1242 & 1254) sampling will need to be done due to the fact that laboratory quality control did not meet EPA criteria. Further analysis may possibly be done from archived soil samples.
4. 6.4.2.: The statement that the chlorinated volatile compounds detected in the water are "ubiquitous in the drinking water of industrialized areas" is misleading and does not justify the presence of these types of compounds in the ground water.

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5. 6.4.1.: The assumption that "horizontal migration is not expected to be a significant problem" is not well founded. It is based on an assumed rough migration rate and does not take into account that the source of the contamination is still present. Additionally, if the area of influence of the irrigation wells is within or near the plume of contamination, then contaminated ground water could be pulled toward those wells.
6. 6.4.1.: It is stated that even if the contaminant plume reaches irrigation wells, that aeration during irrigation would be an effective remedial measure. This would only be transferring a ground water contamination problem to an air quality problem.
7. 6.4.1.: It is also stated that the environmental fate and movement of toluene and xylene would be similar to the chlorinated solvents. The behavior in ground water of chlorinated solvents ("sinkers") and that of the toluene and xylene are not necessarily the same. So why is there the assumption that movement and behavior of those compounds would be similar?
8. 6.4.7.: The influence of irrigation on flow patterns is another possible explanation to anomalies in the concentrations of the inorganic constituents found in the ground water.

General comments:

1. It is recommended that drill cuttings generated during the investigation be disposed of on-site. Before any on-site disposal can take place the generator must determine if the materials would be designated a dangerous waste, in accordance with WAC 173-303-070. After reviewing the data, Ecology has determined there is not enough information to determine designation. Ecology field personnel are not available at this time to assist in this task. If the waste material is not a designated dangerous waste, then Ecology does not see a problem with on-site disposal. Approval for on-site disposal is required from the Benton-Franklin Health District.
2. EPA may be correct in that there is no immediate public health threat or threat to the environment at this site. There is, however, documented ground water contamination, in violation of Chapter 90.48 RCW.

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3. In the Study Findings, EPA outlines recommendations in "management and oversight of the landfill". The recommendations do not "manage" the ground water contamination problem, they monitor the problem. Usage of the word "manage" is incorrect.
4. Has EPA done a MITRE Hazard Ranking System score on this site? It is Ecology's opinion that there is enough information based on the September, 1984, site inspection and this field investigation to do a formal HRS score.
5. Ecology will be requiring additional ongoing monitoring at the landfill to verify EPA's monitoring results and to gather additional data.

If you have any questions, please feel free to contact Carl Nuechterlein or me. Any questions pertaining to designation of the drill cuttings should be directed to Deborah Cornett of this office.

Sincerely,



Flora J. Goldstein
Environmental Quality Division

FJG:adw

cc: Mike Gallagher, Ecology/Olympia
Carol Fleskes, Ecology/Olympia
Stanley Vendetti, R.S., Benton-Franklin Health District